

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

FABIAN URIATE-SOTO *et al.*,

Plaintiffs,

v.

1:11-CV-01075 WJ-SMV

JERROD PELOT *et al.*,

Defendants.

**STIPULATED PROTECTIVE ORDER
FOR PLAINTIFFS' TAX RECORDS**

THIS MATTER comes before the Court on Plaintiffs' Unopposed Motion for Protective Order for Plaintiffs' Tax Records (Doc. 24) to which the parties have stipulated through their respective counsel of record. Being fully advised in the premises, the Court finds that the unopposed motion sets forth good cause for entry of this Stipulated Protective Order for Plaintiff's Tax Records based on the agreement of the parties.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED:

Plaintiffs shall produce the tax returns in their possession for the past 5 tax years (2007 to 2011), and cooperate in obtaining copies of returns for the past 4 tax years to the extent that those records remain within their control, subject to the following terms and conditions:

A. All Defendants and their attorneys of record agree to return Plaintiffs' tax records to Plaintiffs' attorneys of record at the resolution of this lawsuit;


B. All Defendants and their attorneys of record agree to purge all copies of Plaintiffs' tax records from their files, including files containing electronically stored information, at the resolution of this lawsuit;

C. All Defendants and their attorneys of record agree to disclose and produce to Plaintiffs' attorneys of record all tax information about Plaintiffs obtained pursuant to any IRS Forms 4506-T and releases executed pursuant to this Stipulated Protective Order;

D. All Defendants and their attorneys of record agree not to disclose or produce Plaintiffs' tax records to anyone else at any time, except for Plaintiffs, Plaintiffs' attorneys of record, investigators and experts retained and disclosed by the Plaintiffs or Defendants in this matter, and sealed filings with the Court;

E. All Defendants and their attorneys of record agree not to attach or include any of the contents of Plaintiffs' tax records as exhibits to depositions, motions, or other filings without prior Court approval.

IT IS SO ORDERED.



STEPHAN M. VIDMAR
United States Magistrate Judge